

Barentzen, Steven

From: Jerry S. Goldman [jgoldman@goldmanlawyers.com]
Sent: Thursday, August 11, 2005 4:45 PM
To: Barentzen, Steven; Gina MacNeill
Cc: Gina MacNeill; 'Fred Salek, Esq.'
Subject: RE: Stipulation of Briefing Schedule for Taha Al Alwani

I suggest, then, that you contact the court.

jsg

Jerry S. Goldman, Esquire

jgoldman@goldmanlawyers.com

3109 Stirling Road, Suite 101
Fort Lauderdale, FL 33312
Telephone: 954.981.6533
Facsimile: 954.989.8068
Facsimile: 856.858.4606

Above email is for intended recipient only and may be confidential and protected by attorney/client privilege. If you are not the intended recipient, please advise the sender immediately. Unauthorized use or distribution is prohibited and may be unlawful.

-----Original Message-----

Original Message
From: Barentzen, Steven [mailto:Steven.Barentzen@dlapiper.com]
Sent: Thursday, August 11, 2005 2:50 PM
To: Gina MacNeill
Cc: Jerry S. Goldman
Subject: RE: Stipulation of Briefing Schedule for Taha Al Alwani

Ms. MacNeill:

I did not know that you intended to include a provision in the stipulation permitting you to file a RICO Statement. We agree with counsel for Mr. Bin Mahfouz, Williams & Connolly, who in their August 8, 2005 letter to Judge Casey stated that Case Management Order No. 2 only applies to the Federal Insurance plaintiffs. We also believe that to be the case and do not believe you should be permitted to file a RICO statement at this late date.

Moreover, I cannot agree to waive service as a defense. As I told Mr. Goldman yesterday, we intend to defend this action on the ground that you served the wrong Taha Al Alwani.

If you remove those two paragraphs we can agree to the stipulation. If you will not agree to these revisions, please let me know immediately, as we intend to write to Judge Casey and advise him of our support of Williams & Connolloy's August 8, 2005 letter.

Very truly yours, Steven Barentzen:

From: Gina MacNeill [mailto:gmacneill@goldmanlawyers.com]
Sent: Thursday, August 11, 2005 10:59 AM
To: Barentzen, Steven
Cc: Jerry S. Goldman
Subject: Stipulation of Briefing Schedule for Taha Al Alwani

Please find attached a proposed briefing schedule.

Please advise whether this is acceptable.

*Gina M. Mac Neill, Esquire
Law Offices of Jerry S. Goldman & Associates
1500 JFK Boulevard, Suite 1411
Philadelphia, PA 19102
Phone: 215.569.4500 Ext. 25
Fax: 215.569.8899*

Above email is for intended recipient only and may be confidential and protected by attorney/client privilege. If you are not the intended recipient, please advise the sender immediately. Unauthorized use or distribution is prohibited and may be unlawful.

The information contained in this email may be confidential and/or legally privileged. It has been sent for the sole use of the intended recipient(s). If the reader of this message is not an intended recipient, you are hereby notified that any unauthorized review, use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please contact the sender by reply email and destroy all copies of the original message. To contact our email administrator directly, send to postmaster@dlapiper.com

Thank you.
